

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE NATIONAL POSTAL MAIL HANDLERS UNION
(NPMHU/USPS-3 AND 5)**

The United States Postal Service hereby provides its institutional responses to the above-referenced interrogatories of the National Postal Mail Handlers Union, dated April 2, 2012. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

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INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY

NPMHU/USPS-3. Please explain what costs are included in the average relocation cost of \$5,831 (APWU/USPS-T8-2), including in your answer whether this includes such items as paid time off, mileage, per diems, moving expenses, assistance in closing costs, etc.

RESPONSE:

The following costs are included:

- closing costs related to the sale of an employee's previous home and the purchase of a new home;
- costs associated with transporting an employee and his or her family from the previous residence to the location of the employee's new duty station (referred to as "en route travel");
- round-trip transportation costs associated with an employee's trip for the purpose of seeking a permanent residence or mobile home site at his or her new duty location (referred to as "advanced round trip");
- rental costs for a temporary residence (referred to as "temporary quarters");
- costs associated with moving personal items from the previous residence to a new residence (e.g., furniture, appliances, equipment, clothing, and similar property);
- reimbursement for charges paid by an employee for breaking a lease, including a month-to-month rental lease, on a residence the employee occupied at an old duty station, up to a maximum amount of six months rent; and

**INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE TO
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

RESPONSE TO NPMHU/USPS-3 (CONT.):

- a Miscellaneous Expense Allowance that is intended to cover incidental relocation expenses not listed above (e.g., deposits, costs for obtaining a new driver's license).

**INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE TO
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-5. With respect to all facilities in which the AMP study announced on February 23 stating that the facilities will be operated as a transfer hub, please provide all calculations used to determine the number of work hours, and the schedule of work hours, that will be required to operate the hub.

RESPONSE:

Details associated with the hub proposals in the various AMP packages has not yet been undertaken. Such analysis is ordinarily undertaken during implementation and accounted for during Post Implementation Reviews (PIRs).

See Tr. Vol. 2 at 270-271, 279-280 and Tr. Vol. 5 at 2030-2032.